

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1, individually, and on behalf of all others
similarly situated, JANE DOE 2, individually and on behalf
of all others similarly situated, JANE DOE 3, individually
and on behalf of all others similarly situated, JANE DOE
4, individually and on behalf of all others similarly situated
and JANE DOE 5, individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

GOVERNMENT OF THE UNITED STATES VIRGIN
ISLANDS, FIRST LADY CECILE DE JONGH,
GOVERNOR KENNETH MAPP, SENATOR CELESTINO
WHITE, ATTORNEY GENERAL VINCENT FRAZER,
GOVERNOR JOHN DE JONGH, SENATOR CARLTON
DOWE, DELEGATE STACEY PLASKETT, and JOHN
DOES 1-100,

Defendants.

No.: 1:23-cv-10301-AS

**AFFIDAVIT OF
DEFENDANT,
GOVERNOR JOHN DE
JONGH, JR.**

UNITED STATES VIRGIN ISLANDS)
)ss:
DIVISION OF ST. THOMAS / ST. JOHN)

1. I, **JOHN DE JONGH, JR.**, being duly sworn, says the following under penalty of perjury:
2. I reside in the U.S. Virgin Islands, on St. Thomas.
3. I have resided continuously in the U.S. Virgin Islands since 1981.
4. I submit this Affidavit in support of my Motion to Dismiss, Transfer, and Strike the Plaintiffs' First Amended Complaint ("FAC," ECF #7, dated 12/13/2023) in the above captioned action.
5. I am the defendant identified as "Governor John de Jongh, Jr." in the above-captioned FAC.
6. I was the Governor of the Virgin Islands from 1/1/2007 to 1/5/2015.



7. I have never been the Attorney General for the Virgin Islands.
8. At all times during which I resided in the U.S. Virgin Islands, I intended to remain in the U.S. Virgin Islands.
9. I have never resided in the State of New York.
10. I have never had the intent to reside in the State of New York.
11. I have never owned any property in the State of New York.
12. I have never done any business in the State of New York as a private individual.
13. I have never derived any income from the State of New York.
14. I have never derived any revenue from goods used or consumed in New York.
15. I was not served with process in this matter in the State of New York.
16. I have not been served with a copy of the FAC via first-class mail, in person, or otherwise, at a business address, my dwelling place, or my usual place of abode.
17. I have not had the FAC personally delivered to me.
18. As I am no longer the Governor, I have not received, and cannot receive service of the FAC by service upon the Government of the Virgin Islands.
19. The FAC has not been delivered to me within the State of New York, or within the U.S. Virgin Islands.

I state the above under penalty of perjury.



John de Jongh, Jr.

Sworn to before me this 17
day of January, 2024.



Notary Public

NOTARY PUBLIC
Name: LaVerne Slack
Commission Exp. March 18, 2027
Notary Public NP- 596-23
St. Thomas/ St. John District

